

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SAMIAM GROUP, LLC,  
Plaintiff,

v.

COOPERSBURG ASSOCIATES, INC. dba  
COOPERSBURG SPORTS,  
Defendant.

Case No. 22-cv-02256

**PLAINTIFF'S PROPOSED  
VOIR DIRE QUESTIONS**

Plaintiff Samiam Group, LLC ("Samiam") respectfully proposes the following voir dire questions:

1. Are you currently employed or have you been employed in the past? If so, please describe your job.
2. Do you know any of the attorneys in this case?
3. Have you, a family member, or a close friend of yours ever worked for any of the attorneys in this case?
4. Have you, a family member, or a close friend of yours ever worked for either of the parties in this case?
5. Have you ever purchased or owned a product made or sold by either of the parties in this case? If yes, what?
6. Have you, a family member, or a close friend of yours ever worked for the United States Patent & Trademark Office or the United States Copyright Office?
7. Have you, a family member, or a close friend of yours ever worked for a company that was involved in a dispute over patents, copyrights or trademarks?
8. Have you, a family member, or a close friend of yours ever been involved in a dispute over patents, copyrights or trademarks?

9. Have you, a family member, or a close friend of yours ever obtained, or tried to obtain, a patent, copyright or trademark?

10. This lawsuit arises from a dispute over a kind of drinking vessel sold at Major and Minor League Baseball games. Have you ever bought a beverage at a baseball game?

11. Do you like to drink beer? If so, did you ever buy a beer at a sports stadium?

12. Are you generally familiar with how beer, soda, or other beverages are sold at Major or Minor League Baseball games?

13. Have you ever bought merchandise or souvenirs at a Major or Minor League Baseball game?

14. Have you, a family member, or a close friend of yours ever worked at a sports stadium?

15. Have you, a family member, or a close friend of yours ever worked for a professional sports team or league?

16. Have you, a family member, or a close friend of yours ever worked for a company that makes, markets or sells professional sports souvenirs or memorabilia?

17. In this lawsuit the jury will be asked to visually compare the plaintiff's patent drawings with the defendant's drinking vessel. Do you have any kind of visual impairment that might interfere with your ability to make such a comparison?

18. Some people have strong opinions about patents, copyrights and trademarks, and whether they are generally a good or bad thing for society to allow. Do you have any such opinion, and could that opinion interfere with your ability to render a fair verdict according to the law?

19. The plaintiff in this case is owned by an African American, and the defendant is owned by a white person. Is this racial difference likely to affect your ability to render a fair verdict according to the law?

20. What is your educational background?

21. Part of this trial may involve a good amount of arithmetic and numerical calculations such as addition, subtraction, multiplication and division. Do you believe you may have difficulty digesting and understanding such calculations?

Respectfully submitted,

Date: February 8, 2023

/s/ Robert L. Epstein, Esq.  
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*Attorneys for Samiam Group, LLC*

### **CERTIFICATE OF SERVICE**

I hereby certify that, on the date appearing below, a copy of the within document was served on all counsel of record via ECF.

Date: February 8, 2023

/s/ Jonathan R. Miller, Esq.